

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

LA UNION DEL PUEBLO ENTERO,)
et al.)
 Plaintiffs)
)
VS.)
)
)
GREGORY W. ABBOTT, et al.)
 Defendants)

CASE NO.
5:21-cv-844-XR
(LEAD CASE)

OCA-GREATER HOUSTON, et al.)
 Plaintiffs)
)
VS.)
)
)
JANE NELSON, et al.)
 Defendants)

CASE NO.
1:21-cv-780-XR

HOUSTON AREA URBAN LEAGUE,)
et al.)
 Plaintiffs)
)
VS.)
)
)
GREGORY WAYNE ABBOTT, et al.)
 Defendants)

CASE NO.
5:21-cv-848-XR

LULAC TEXAS, et al.)
 Plaintiffs)
)
)
VS.)
)
)
JANE NELSON, et al.)
 Defendants)

CASE NO.
1:21-cv-0786-XR

MIFAMILIA VOTA, et al.)(
Plaintiffs)

VS.)(CASE NO.
) 5:21-cv-0920-XR
GREG ABBOTT, et al.)
Defendants)

UNITED STATES OF AMERICA)
 Plaintiff)
)
VS.)
)
THE STATE OF TEXAS, et al.)
 Defendants)

CASE NO.
5:21-cv-1085-XR

ORAL AND VIDEOTAPED DEPOSITION OF
MARIA GOMEZ
APRIL 25, 2023

ORAL AND VIDEOTAPED DEPOSITION OF MARIA GOMEZ,
produced as a witness at the instance of the State
Defendants, taken in the above-styled and numbered
cause on APRIL 25, 2023, between the hours of
10:07 a.m. and 12:17 p.m., reported stenographically by
DONNA McCOWN, Certified Court Reporter No. 6625, in and
for the State of Texas, at La Union Del Pueblo Entero,
1601 US 83 Business, San Juan, Texas, pursuant to the
Federal Rules of Civil Procedure and any provisions
stated on the record or attached therein.

1 about, were there any documents that y'all reviewed?

2 A. No.

3 Q. Well, like I said, Maria, my name is Luis
4 Suarez. So kind of how this goes is I'm going to ask
5 you some questions, and the court reporter here will be
6 taking them down. And I just need you to respond
7 truthfully the best you -- the best way you can. Do
8 you understand that?

9 A. Yes.

10 Q. How old are you, Ms. Gomez?

11 A. 74.

12 Q. And do you live in Harlingen?

13 A. No.

14 Q. Where do you live?

15 A. In Pharr.

16 Q. Is that about 20 minutes from here?

17 A. More or less.

18 Q. And how long have you lived in Pharr?

19 A. For many years.

20 Q. Were you born in Pharr?

21 A. Yes.

22 Q. And you -- do you currently work for LUPE?

23 A. No.

24 Q. Where do you currently work?

25 A. I am retired.

1 Q. Where did you work before you retired?

2 MS. SERNA URIBE: Objection, vague.

3 A. At LUPE.

4 Q. Let me take a step back. There will be times
5 when your attorney will object. You can let her finish
6 her objection and then still answer, unless she
7 instructs you not to. Okay?

8 A. Okay.

9 Q. So you said before you retired you worked for
10 LUPE; is that correct?

11 A. Yes.

12 Q. How long did you work for LUPE?

13 A. I don't remember how many years.

14 Q. Could you give an estimate?

15 A. More than ten.

16 Q. Did you work somewhere before that?

17 MS. SERNA URIBE: Objection, vague.

18 Q. You can answer.

19 A. What's the question?

20 Q. Did you work somewhere before you worked for
21 LUPE?

22 A. Yes.

23 Q. And where did you work?

24 A. Union de Campesinos and in the field.

25 Q. What is Union de Campesinos?

1 A. It is an agricultural workers union.

2 Q. And what did you do for them?

3 MS. SERNA URIBE: Objection, vague.

4 Q. You can answer.

5 A. What's the question?

6 Q. What did you do for the Union de Campesinos?

7 A. There were multiple jobs, different jobs.

8 Q. Did you have a specific role?

9 MS. SERNA URIBE: Objection, vague.

10 A. We had different roles, but one of them was for
11 us to work with people in the fields for them to know
12 their rights.

13 Q. Okay. Let's take a step back -- or let's go
14 back to your work for LUPE. What have you been
15 doing -- or what did you do for LUPE for those ten
16 years -- approximately ten years?

17 MS. SERNA URIBE: Objection, vague.

18 Q. You can answer.

19 A. I was an organizer in the colonias.

20 Q. As an organizer in the colonias, what does that
21 entail? Can you give a general description of your job
22 title?

23 MS. SERNA URIBE: Compound question.

24 Objection, compound question.

25 Q. You can answer.

1 A. We would work to improve the colonias, like the
2 streets, the utilities, like water, and also for the
3 people to learn their rights.

4 Q. When you were doing this work for LUPE, were
5 you compensated?

6 MS. SERNA URIBE: Objection, vague.

7 Q. You can answer.

8 A. Yes, I was doing a job.

9 Q. About how much were you paid?

10 A. I don't remember.

11 Q. And do you do any volunteer work currently for
12 LUPE?

13 A. Yes. Yes. I love it.

14 Q. How long ago did you retire?

15 A. I believe it was about seven, eight years.

16 Q. Did you begin volunteering immediately after
17 you retired for LUPE?

18 A. No.

19 Q. When did you begin volunteering for LUPE?

20 A. I don't remember, because I was sick. My -- I
21 had a problem with my knee.

22 Q. Do you remember generally when you had a
23 problem with your knee, that time frame?

24 A. Like for two years.

25 Q. Do you remember the time frame, what years that

1 was?

2 A. I don't remember.

3 Q. Was it more than two years ago?

4 A. Of what?

5 Q. Since you began working as a volunteer for
6 LUPE.

7 MS. SERNA URIBE: Objection, asked and
8 answered.

9 Q. You can answer.

10 A. Yes.

11 Q. When -- currently, as a volunteer, what is your
12 role for LUPE?

13 A. Well, to go to the trainings, to the talks that
14 they have here, to go to community meetings.

15 Q. You attend the talks and attend the meetings;
16 is that correct?

17 A. Yes.

18 Q. And as far as assisting other people, could you
19 describe that role?

20 MS. SERNA URIBE: Objection, vague.

21 A. Helping how?

22 Q. You help -- do you help people within the
23 community?

24 A. Yes.

25 Q. Could you describe that work?

1 A. I visit people at home, and I visit other
2 people like me.

3 Q. And what do y'all generally do?

4 MS. SERNA URIBE: Objection, vague.

5 Q. You can answer.

6 A. Well, I take some people to the doctor. To
7 others, I help them. I clean their rooms. To others,
8 I try to talk to them. I -- I take food to share. I
9 try to also to do the hygiene.

10 MS. SERNA URIBE: Would it be possible to
11 have the interpreter also interpret my objections?

12 MR. SUAREZ: That's fine.

13 MS. SERNA URIBE: Thank you.

14 THE INTERPRETER: I'll do that.

15 Q. As -- as far as your volunteer work with LUPE,
16 do you ever assist people -- or do you ever assist
17 people with voting?

18 MS. SERNA URIBE: Objection, vague.

19 Q. You can answer.

20 A. I used to do it before, but I don't feel
21 committed. I mean, I don't feel able to do it right
22 now.

23 Q. When you say you used to do it before, when did
24 you used to do it?

25 A. I believe it was before '21.

1 Q. What happened in '21 that changed your
2 position?

3 A. I started here --

4 MS. SERNA URIBE: Objection -- sorry --
5 vague; calls for speculation.

6 MR. SUAREZ: You can still translate what
7 she said.

8 A. I started hearing that there was a change in
9 the laws, and I didn't want to continue because I
10 didn't want to make a mistake.

11 Q. You said that you heard there was a change in
12 the law, correct?

13 MS. SERNA URIBE: Objection, vague and
14 calls for speculation.

15 Q. You can answer.

16 A. Well, we didn't have to help the people anymore
17 to vote. Well, it's not that we couldn't. They didn't
18 want us to. I mean, us, that we were helping people to
19 vote, we didn't have to do it anymore.

20 Q. Why didn't -- why didn't y'all have to do it
21 anymore?

22 MS. SERNA URIBE: Objection, vague.

23 Q. You can answer.

24 A. I wasn't -- I wasn't feeling that okay to help
25 people to vote because I didn't know how strong the law

1 was, how strong the law was as far as us helping. And
2 when people would ask me, I will let them know that
3 there were people inside that could help them. I was
4 feeling impotent because I couldn't help them.

5 Q. You were -- you felt powerless, or you felt
6 impotent to help?

7 A. Yes, because what I was hearing about the
8 change in the law.

9 Q. Did LUPE ever instruct you not to -- to stop
10 helping people vote?

11 MS. SERNA URIBE: Objection, vague;
12 mischaracterizes the testimony.

13 Q. You can answer.

14 THE INTERPRETER: Could you repeat the
15 question? The interpreter didn't interpret it.

16 Q. Did you ever -- did LUPE ever instruct you not
17 to help people vote?

18 A. No.

19 Q. So you stopped helping people vote because you
20 were worried about the law; is that correct?

21 MS. SERNA URIBE: Objection,
22 mischaracterizes prior testimony; objection, vague.

23 Q. You can answer.

24 A. What's the question?

25 Q. You weren't instructed to stop helping people

1 vote, but you felt worried about the law and that's why
2 you stopped helping people vote; is that correct?

3 MS. SERNA URIBE: Same objections.

4 A. I decided.

5 Q. Why -- how did you come to that decision?

6 MS. SERNA URIBE: Objection, vague; and
7 objection, calls for speculation.

8 Q. You can answer.

9 A. What was the question I need to answer?

10 Q. How did you come to that decision to stop
11 helping people vote?

12 MS. SERNA URIBE: Same objections.

13 Q. You can answer.

14 A. Because of the restrictions and then under oath
15 and so many things that I didn't understand.

16 Q. Were you -- have you ever read the law -- or
17 the SB 1 law?

18 A. I have heard of it.

19 Q. When you say you've heard of it, where have you
20 heard of it?

21 MS. SERNA URIBE: Objection, vague.

22 Q. You can answer.

23 A. Well, on TV, on the radio, with people.

24 Q. When you went to trainings or meetings with
25 LUPE, did they ever discuss the law?

1 MS. SERNA URIBE: Objection, vague.

2 A. I don't remember.

3 Q. Did you ever communicate your concerns about
4 assisting voters with anybody within LUPE's management
5 or any community organizers or anybody else?

6 MS. SERNA URIBE: Objection, vague.

7 Q. You can answer.

8 A. What's the question?

9 Q. Did you --

10 A. I'm sorry.

11 Q. It's okay. Did you ever share any of your
12 concerns regarding the SB 1 law with anybody in LUPE,
13 any community organizers, any staff?

14 MS. SERNA URIBE: Same objections. Also
15 objection for compound question.

16 A. I don't remember.

17 Q. Before 2021, you used to help people vote; is
18 that correct?

19 MS. SERNA URIBE: Objection, vague.

20 A. Yes.

21 Q. Did those people ever contact you after 2021 to
22 seek your assistance?

23 MS. SERNA URIBE: Objection, vague.

24 A. I don't remember.

25 Q. Did you ever communicate to any people you

1 previously helped vote that you were no longer going to
2 assist them vote?

3 MS. SERNA URIBE: Objection, vague.

4 Q. You can answer.

5 A. Yes, they did ask me.

6 Q. And what was your response?

7 A. I told them that I was not trained anymore to
8 be able to help them.

9 Q. Okay. Ms. Gomez, I want to narrow down what
10 you were no longer trained for. You no longer received
11 any training after SB 1 was passed. Is that your
12 testimony?

13 MS. SERNA URIBE: Objection, vague.

14 Q. You can answer.

15 MS. SERNA URIBE: Objection,
16 mischaracterizes the prior testimony.

17 A. I don't remember.

18 Q. You said you loved helping people or
19 volunteering for LUPE; is that correct?

20 A. Yes.

21 Q. So deciding not to help people vote is a big
22 decision; is that correct?

23 MS. SERNA URIBE: Objection, vague;
24 objection, mischaracterizes prior testimony.

25 Q. You can answer.

1 A. Repeat the question. I'm sorry.

2 Q. Would you agree with me it's a big decision to
3 stop helping people vote, considering how much you
4 loved to help people and volunteer?

5 MS. SERNA URIBE: Objection, vague.

6 A. I didn't feel it was a bad decision, because I
7 could help in other ways.

8 Q. So the decision to stop helping people vote
9 didn't -- strike that.

10 So you weren't -- were you concerned at
11 your decision to stop helping people vote?

12 MS. SERNA URIBE: Objection, vague.

13 A. Well, yes.

14 Q. Would you have done anything possible to
15 familiarize yourself with SB 1 so you could continue
16 helping people vote?

17 MS. SERNA URIBE: Objection, vague; and
18 objection, calls for speculation.

19 Q. You can answer.

20 A. I don't think my mind is as good to continue
21 learning that much anymore. But physically, me, yes, I
22 am ready.

23 Q. Did you do anything to learn about the
24 purported restraints of SB 1?

25 MS. SERNA URIBE: Objection, vague.

1 Q. You can answer.

2 A. Can you ask me the question again?

3 Q. Did you do anything to familiarize yourself
4 with the purported restraints of SB 1?

5 MS. SERNA URIBE: Same objection, vague.

6 A. I tried.

7 Q. Can you explain your efforts?

8 MS. SERNA URIBE: Objection, vague.

9 A. Well, I tried to learn a little bit more, but
10 my mind wasn't getting a lot, and so I tried to help
11 some other ways.

12 Q. When you say you tried to learn a little bit
13 more, could you explain what you did exactly?

14 MS. SERNA URIBE: Objection, vague.

15 Q. You can answer.

16 A. Well, whenever there was a meeting, I will
17 listen to it. I will go and hear about voting.

18 Q. Is that it?

19 A. I think so. That's what I remember.

20 Q. So in these meetings, did -- did you hear
21 something that concerned you specifically about SB 1?

22 MS. SERNA URIBE: Objection, vague; and
23 objection, calls for speculation.

24 Q. You can answer.

25 A. Can you ask the question again?

1 Q. When you attended these meetings to familiarize
2 yourself with SB 1, did you hear something that
3 concerned you specifically about SB 1?

4 MS. SERNA URIBE: Same objections.

5 A. I don't remember.

6 Q. There had to be something that concerned you,
7 correct?

8 MS. SERNA URIBE: Objection, vague;
9 objection asked and answered; objection, argumentative.

10 Q. You can answer.

11 A. I was concerned with me not being able to help
12 people to vote.

13 Q. When you say you were concerned you weren't
14 able to help people vote, what was told to you or what
15 was your belief of why you could no longer do that?

16 MS. SERNA URIBE: Objection, vague;
17 objection, calls for speculation; and objection, it's a
18 compound question.

19 Q. You can answer.

20 A. I need the question again.

21 Q. When you say that you were concerned regarding
22 the bill, what was told to you or what was your
23 understanding of SB 1 that prevented you or concerned
24 you from helping people to vote?

25 MS. SERNA URIBE: Same objections.

1 A. I think that more than anything, it was the
2 fear that that law would be hurting me for me helping
3 people to vote.

4 Q. But what was -- what was the basis of that
5 fear?

6 MS. SERNA URIBE: Objection, vague;
7 objection, calls for speculation.

8 A. I believe to hear the negative things about
9 this law.

10 Q. To your understanding, what were the negative
11 things about the law?

12 MS. SERNA URIBE: Objection, vague; and
13 objection, calls for speculation.

14 A. I don't remember right now, but yes, but I
15 don't remember.

16 Q. Would you go help people to go vote today if
17 you could?

18 MS. SERNA URIBE: Objection, vague;
19 objection, calls for speculation.

20 Q. You can answer.

21 A. Can you ask me again?

22 Q. Would you go help people today to go vote if
23 you could?

24 MS. SERNA URIBE: Same objections.

25 A. If I could, I would think so. Without fear,

1 yes.

2 Q. So what is stopping you? What is the fear
3 stopping you today?

4 MS. SERNA URIBE: Objection, vague.

5 A. The fear that this law is going to affect me
6 personally.

7 Q. Is that -- strike that.

8 When you say this law will affect -- the
9 fear that this law will affect you personally, is that
10 in regards to mail-in voting?

11 MS. SERNA URIBE: Objection, vague.

12 A. Part of it.

13 Q. What parts of the mail-in voting portions of
14 SB 1 worry you?

15 MS. SERNA URIBE: Objection, vague.

16 A. It was a drastic change. We didn't get the
17 voting card to vote through mail. And several people
18 cannot go and vote at the voting polls. That's one of
19 my fears.

20 Q. Your fear is that people were no longer getting
21 mail-in ballots?

22 MS. SERNA URIBE: Objection,
23 mischaracterizes the testimony.

24 A. Yes.

25 Q. Do you know of anybody that requested a mail-in

1 ballot and did not receive one?

2 MS. SERNA URIBE: Objection, vague;
3 objection, calls for speculation; and objection, it
4 lacks personal knowledge.

5 Q. You can answer.

6 A. I don't remember.

7 Q. Do you know anybody that was unable to vote
8 because they didn't receive a mail-in ballot -- mail-in
9 ballot?

10 MS. SERNA URIBE: Objection, vague;
11 objection, calls for speculation; and objection, lack
12 of personal knowledge.

13 A. I don't remember how many, but -- I don't
14 remember.

15 Q. When you say you don't remember how many, do
16 you remember -- are you saying you do remember there
17 was at least one instance of that happening?

18 MS. SERNA URIBE: Objection, vague;
19 objection, mischaracterizes prior testimony.

20 Q. You can answer.

21 A. Yes.

22 Q. And how do you know that?

23 MS. SERNA URIBE: Objection, vague.

24 A. Due to my home visits that I make.

25 Q. Can you describe the interaction when you made

1 that home visit?

2 MS. SERNA URIBE: Objection, vague.

3 Q. You can answer.

4 A. The what?

5 Q. The visit that you had with the person that
6 said they couldn't -- they couldn't vote by mail.

7 MS. SERNA URIBE: Same objections; and
8 objection that it calls for speculation.

9 A. The person?

10 Q. Well, are --

11 A. The person that I visited -- I don't understand
12 the question.

13 Q. Let me backtrack. Are you saying that there
14 has been a person with whom you've interacted that
15 indicated that they were not able to vote by mail?

16 A. Yes.

17 Q. And you met with this person at their home?

18 A. Yes.

19 Q. What did they tell you specifically?

20 MS. SERNA URIBE: Objection, vague.

21 A. I don't remember.

22 Q. That would be a pretty big deal, wouldn't you
23 agree?

24 MS. SERNA URIBE: Objection, calls for
25 speculation; objection, vague.

1 Q. You can answer.

2 A. Can you repeat the question, please?

3 Q. It would be a pretty big deal if someone told
4 you they couldn't vote by mail, correct?

5 MS. SERNA URIBE: Same objections.

6 A. Well, yes.

7 Q. And you're telling me you just forgot that?

8 MS. SERNA URIBE: Objection, vague;
9 objection, mischaracterizes the prior testimony;
10 objection, argumentative.

11 Q. You can answer.

12 A. Maybe I got confused with the question. I was
13 asked if during my home visits I found some people that
14 had not been able to vote by mail, right?

15 Q. That's correct.

16 A. That's how it was.

17 Q. And you also said that you don't remember what
18 y'all talked about when y'all had those conversations.

19 MS. SERNA URIBE: Objection, vague;
20 objection, mischaracterizes prior testimony.

21 Q. You can answer.

22 A. Like I said, it wasn't one. It was several
23 people that I visited. And that's why I said that I
24 don't remember how long we talked or what we talked
25 about.

1 Q. So it's your testimony that multiple people
2 that you met with at homes told you that they could not
3 vote by mail because of SB 1?

4 MS. SERNA URIBE: Objection, vague;
5 objection, mischaracterizes prior testimony.

6 A. Due to what?

7 Q. Due to SB 1 and the provisions of the mail-in
8 voting.

9 MS. SERNA URIBE: Same objections.

10 A. They did not receive their ballot to vote.

11 Q. Did they ever request a ballot?

12 MS. SERNA URIBE: Objection, calls for
13 speculation; and objection -- I'm sorry, withdraw.

14 A. The ballot comes by mail, but several people
15 did not receive it.

16 Q. I'm asking you whether those people you claim
17 to have personal knowledge of that did not receive
18 these mail-in ballots, did they ever request a mail-in
19 ballot?

20 MS. SERNA URIBE: Objection, calls for
21 speculation.

22 A. I need the question again.

23 Q. From people that you were talking about that
24 did not receive a mail-in ballot, to your personal
25 knowledge, did they ever request a mail-in ballot?

1 MS. SERNA URIBE: Same objection, calls
2 for speculation.

3 A. They didn't ask for them because it was already
4 late for them to register.

5 Q. Is -- strike that.

6 When you say it was late for them to
7 register, is that -- has that been an issue before --
8 before SB 1 was passed?

9 MS. SERNA URIBE: Objection, vague; and
10 objection, calls for speculation.

11 Q. You can answer.

12 A. It's that there is a time for you to register.
13 Once the time passes, you can no longer register until
14 the following year.

15 Q. So to your knowledge, the people that have had
16 issues with mail-in voting was because they didn't
17 register in time; is that correct?

18 MS. SERNA URIBE: Objection, vague; and
19 objection, calls for speculation.

20 A. It's that so many of them didn't even know that
21 they had to register for them to get their ballots over
22 the mail.

23 Q. Were there any other instances where -- to your
24 knowledge, where people could not vote by mail other
25 than their failure to register in a timely manner?

1 MS. SERNA URIBE: Objection, vague.

2 A. The problem is that they didn't register. The
3 problem is that they didn't know that they -- they
4 should have registered to receive them. They were
5 waiting for their ballots over the mail like before.

6 Q. Did -- at your LUPE meetings, did they not
7 represent to y'all that that was one of the new
8 requirements of SB 1, to inform voters that they needed
9 to register to vote?

10 MS. SERNA URIBE: Objection, vague; and
11 objection, it calls for speculation.

12 Q. You can answer.

13 A. It's that these are older people. They don't
14 come to the meetings that much.

15 Q. I'm speaking as to the -- to you as a
16 volunteer, did they not inform you that that was a
17 requirement?

18 MS. SERNA URIBE: Objection, vague.

19 A. Requirement for what?

20 Q. That you must register in order to vote.

21 A. Yes. They did inform us, but for us to visit
22 all of these people was not an easy thing.

23 Q. Prior to SB 1 when you were a volunteer, did
24 you have to help people register to vote?

25 MS. SERNA URIBE: Objection, vague.

1 A. We would be trained.

2 Q. And people that voted by mail-in ballots, to
3 your understanding, did they still have to be
4 registered to vote?

5 MS. SERNA URIBE: Objection, vague.

6 A. The problem here is that they stopped sending
7 the ballots to vote over the mail. Not all of us
8 received them.

9 Q. Was there any other problem aside -- aside from
10 that that prevented you from helping people vote by
11 mail?

12 MS. SERNA URIBE: Objection, vague.

13 A. Well, more than anything, I think it was my
14 fear for something to affect me, something that would
15 be in the law that will affect me.

16 Q. So you were -- were you worried about making a
17 mistake?

18 MS. SERNA URIBE: Objection, vague.

19 A. Due to me not understanding the laws that well.

20 Q. In respect to mail-in voting or in general?

21 MS. SERNA URIBE: Objection, vague.

22 A. Well, in general.

23 Q. But you can't point to any specific part of
24 SB 1 that worried you, correct?

25 MS. SERNA URIBE: Objection, vague;

1 objection, calls for speculation.

2 A. No.

3 Q. As far as the mail-in voting, are you aware of
4 any instances where someone was not able to vote other
5 than the -- their failure to register on time?

6 MS. SERNA URIBE: Objection, calls for
7 speculation.

8 A. I don't remember.

9 Q. As a volunteer, prior to SB 1, did you help
10 people vote by mail?

11 MS. SERNA URIBE: Objection, vague.

12 A. Yes.

13 Q. And it's your testimony that because of SB 1,
14 you no longer can help people vote by mail?

15 A. I don't understand the law that well. That's
16 why I'm trying not to help those people.

17 Q. Do you give them a number or somebody else that
18 they can reach to seek assistance voting my mail?

19 MS. SERNA URIBE: Objection, vague.

20 A. Yes, right, there at the voting polls.

21 Q. If it's at the voting polls, then it wouldn't
22 be voting by mail, correct?

23 MS. SERNA URIBE: Objection, vague;
24 objection, calls for speculation.

25 A. It's that there was two different ways, one

1 voting in person, voting by mail.

2 Q. So for now, I'm talking about voting by mail.
3 Did you ever tell anybody that requested assistance to
4 vote by mail and give them a number of someone else
5 they can contact for assistance?

6 A. I get them information where they can call to
7 ask.

8 Q. As far as -- let's move forward a little bit.
9 As far as --

10 MS. SERNA URIBE: Luis, could we take a
11 break? It's been about an hour or so.

12 MR. SUAREZ: Yeah. I'll strike that
13 question, pick up after.

14 (Brief recess)

15 MS. SERNA URIBE: Can we state the time,
16 please.

17 THE VIDEOGRAPHER: 1:12 a.m.

18 Q. Ms. Gomez, I just want to clear something up.
19 Of the people that you mentioned couldn't vote by mail
20 due to late registration, are you aware of your
21 personal -- to your personal knowledge, did they
22 request a mail-in ballot?

23 MS. SERNA URIBE: Objection, calls for
24 speculation.

25 A. I don't know.

1 A. What's the question?

2 Q. You testified earlier that you had other
3 general fears about SB 1. Do you recall?

4 A. Yes.

5 Q. I believe you mentioned one of those fears was
6 regarding the oath. Do you recall?

7 A. Because I don't know if they already changed
8 the questions under oath -- to be under oath.

9 Q. So if they didn't change the questions, you
10 didn't have a problem with the old questions?

11 MS. SERNA URIBE: Objection, vague; and
12 objection, calls for speculation.

13 A. Well, I don't know.

14 Q. Well, before SB 1, did you help people -- did
15 you assist people to vote?

16 A. What's the question?

17 Q. Before SB 1, before 2021, did you help people
18 vote? Did you assist people to vote?

19 MS. SERNA URIBE: Objection, vague.

20 A. Sometimes.

21 Q. Did you ever have to take an oath prior to
22 assisting people to vote?

23 A. Yes.

24 Q. Did you ever have any problems completing that
25 oath?

1 MS. SERNA URIBE: Objection, vague.

2 A. Yes.

3 Q. What were those problems?

4 A. There at voting polls, the people there will
5 say that they could help them, that they didn't need
6 us.

7 Q. So people told you they didn't need your help
8 and you still assisted them?

9 MS. SERNA URIBE: Objection,
10 mischaracterizes the testimony.

11 A. No. I understood the question the wrong way.
12 Can you do it again since the beginning?

13 Q. Sure. The question was whether before SB 1 you
14 helped people with the oath -- or strike that.

15 The question was, before SB 1, did you
16 help people with voting assistance?

17 MS. SERNA URIBE: Objection, vague.

18 A. Yes.

19 Q. And you took an oath prior to assist people to
20 vote?

21 A. Yes.

22 Q. Then you said that there was problems when you
23 took that oath. Do you recall that?

24 MS. SERNA URIBE: Objection,
25 mischaracterizes prior testimony.

1 A. Because the people that were there, they said
2 they could help these people.

3 Q. I'm confused at what you mean by the people
4 there. Are you talking about other assisters?

5 A. There's always someone helping there at the
6 voting polls.

7 Q. I understand that, but in regards to the oath,
8 what was the -- what was the problem?

9 MS. SERNA URIBE: Objection, vague.

10 A. If I wanted to help someone, the person that
11 was there helping, they would say that they could help
12 that person. But the person will make that decision.
13 They would say that I could help them.

14 Q. When you say "the person," do you mean the
15 voter or the assister?

16 A. The person -- the one that was going to vote,
17 that was the one that would decide.

18 Q. Can you explain to me how that is problematic
19 of the oath?

20 A. Not with the oath. But when we were going to
21 be assisting someone to vote, the person that was there
22 would say that they could assist them. I didn't have
23 to take the oath, so I wouldn't be able to help them.

24 Q. So prior to 2021, you never took the oath to
25 help people -- to assist people to vote?

1 A. Of course I did.

2 Q. And the problem with that oath is that other
3 people didn't take the oath?

4 A. No. Well, they would be working there. They
5 were the ones that were working at the polling onsite.

6 Q. As far as you yourself as a volunteer, did you
7 have a problem with the oath?

8 MS. SERNA URIBE: Objection, vague.

9 A. No.

10 Q. But you have a problem with the new oath; is
11 that correct?

12 A. No. It's not just -- it's not about the oath.
13 It's about the restrictions. I don't have a problem
14 with the oath. I just don't feel capable or -- to
15 assist the people to vote.

16 Q. So you don't have a problem with the oath under
17 SB 1; is that correct?

18 MS. SERNA URIBE: Objection, vague.

19 A. Well, I don't understand it that well nowadays.
20 That's why I'm not -- I'm trying not to help people to
21 vote.

22 Q. So you stopped assisting people to vote because
23 you don't understand the oath. Is that fair to say?

24 MS. SERNA URIBE: Objection,
25 mischaracterizes prior testimony.

1 A. Yes, because I don't feel at peace. I don't
2 feel capable.

3 Q. What part of the oath makes you feel incapable
4 of giving it -- sorry, of taking it?

5 MS. SERNA URIBE: Objection, vague.

6 A. Right now I don't know, but I don't want to
7 risk on doing something that I feel that I'm not able
8 to do.

9 Q. You felt that you're unable to take the oath?

10 A. Not the oath, but how the law is nowadays, what
11 are the requirements, how many are the requirements.

12 Q. So correct me if I'm wrong. You didn't -- you
13 don't have a problem with the oath. You have a problem
14 with the restrictions around voting assistance; is that
15 correct?

16 A. Yes, the restrictions. Then also restrictions
17 that I don't understand that well, and that I don't
18 want those problems for me.

19 Q. Can you identify what those alleged
20 restrictions are?

21 MS. SERNA URIBE: Objection, vague.

22 A. Well, I don't know, but they're written there,
23 or I have heard about them, that we cannot be -- we're
24 not able to help the people to vote.

25 Q. You say you've heard about the restrictions?

1 A. Yes, I have heard about them, and that's why I
2 will be abstaining myself from having that problem.

3 Q. What restrictions did you hear about?

4 A. Especially the one that we have heard about the
5 most is that we're not able to help people to vote,
6 especially us as volunteers.

7 Q. You were told that you can no longer volunteer?

8 MS. SERNA URIBE: Objection,
9 mischaracterizes the testimony.

10 A. I don't believe so. I don't think they have
11 told me that I cannot be a volunteer, but I can't do it
12 because I don't feel, like, able to do it. I don't
13 feel free like I used to before. I feel like my hands
14 are tied.

15 Q. Why do you feel like your hands are tied?

16 A. Because what you hear about the law, that we're
17 not able to help people to vote.

18 Q. That brings me back to the question of whether
19 you were ever told or ever heard of an instance where
20 you couldn't help people vote.

21 MS. SERNA URIBE: Objection, vague.

22 A. After '21, I haven't tried to go with them to
23 the voting poll inside to help them vote.

24 Q. So you haven't tried to assist people to vote
25 in the last election?

1 A. No.

2 Q. And that's because of your fear of being an
3 assister?

4 A. Yes.

5 Q. Even though you can't point to any specific
6 part of SB 1 that you're afraid of?

7 A. I don't know.

8 Q. So you -- you didn't try to help people vote in
9 the last election?

10 A. To go inside with them, no.

11 Q. Do you know of other people that were voting
12 assisters in the last election?

13 MS. SERNA URIBE: Objection, vague;
14 objection, calls for speculation.

15 A. I don't remember.

16 Q. Do you have a lot of friends in LUPE that are
17 volunteers?

18 A. Some.

19 Q. And you don't know any of them that volunteer
20 to assist, help people vote?

21 MS. SERNA URIBE: Objection, calls for
22 speculation.

23 A. I don't know.

24 Q. Were you at the polling station last election?

25 MS. SERNA URIBE: Objection, vague.

1 Q. As a volunteer.

2 MS. SERNA URIBE: Objection, vague.

3 A. I take people.

4 Q. You took people to the voting location?

5 A. Some.

6 Q. Did you -- did they ever request help voting?

7 MS. SERNA URIBE: Objection, vague;

8 objection, calls for speculation.

9 A. I have always told them that they have the
10 right to vote, that that's their right. But they know
11 who they vote for -- to vote for.

12 Q. About how many people did you take to the
13 voting locations?

14 A. I don't remember.

15 Q. More than five?

16 A. I think.

17 Q. More than ten?

18 A. I don't remember.

19 Q. So you know it was more than five, but you
20 don't know if it was more than ten?

21 A. Well, I didn't count them.

22 Q. How would you take them to the polling
23 location?

24 MS. SERNA URIBE: Objection, vague.

25 Q. You can answer.

1 A. In my car.

2 Q. How many people fit in your car?

3 A. I don't know.

4 Q. What kind of car do you have?

5 A. Right now, I have a small van.

6 Q. Is that the same van that you had at the --
7 during the last election?

8 A. No.

9 Q. What car did you have during the last election?

10 A. A different one.

11 Q. What kind?

12 A. A van, but I don't know what kind.

13 Q. Do you know how many people fit inside that van
14 at one time?

15 A. You can fit, like, five or six, but I never
16 took that many at the same time.

17 Q. But you made multiple trips. Is that fair?

18 A. On different days.

19 Q. Did you ever have problems transporting anybody
20 to vote?

21 MS. SERNA URIBE: Objection, vague.

22 Q. You can answer.

23 A. No.

24 Q. Back before 2021, you mentioned that you felt
25 at liberty to help people vote; is that correct?

1 A. Yes.

2 Q. And you enjoyed helping people to vote?

3 A. Yes.

4 Q. And did you do that for the whole ten years
5 while you were working for LUPE?

6 A. What do you mean?

7 Q. Did you help people vote for the ten years that
8 you worked at LUPE?

9 A. On my free time.

10 Q. And when you became a volunteer for around
11 eight years, did you help people vote as a volunteer at
12 LUPE?

13 A. Sometimes.

14 Q. So is it fair to say for around at least
15 18 years, you've been helping people vote prior to
16 2021?

17 A. Not fully.

18 Q. For around -- around how long ago did you start
19 helping people vote?

20 A. I don't remember.

21 Q. Ten years ago?

22 A. I believe that before, but I wasn't working nor
23 for LUPE nor for La Union.

24 Q. So it's fair to say, then, it's been over
25 25 years that you've been helping people vote?

1 MS. SERNA URIBE: Objection, vague.

2 A. More or less.

3 Q. And it's your testimony now that because of
4 SB 1 you can no longer do something that you've been
5 doing for over 25 years?

6 MS. SERNA URIBE: Objection,
7 mischaracterizes the testimony.

8 Q. You can answer.

9 A. I think that also -- I mean, I take a lot under
10 consideration my age to be able to help people to vote,
11 my age and the fear for me to do something wrong
12 because of the changes in the law.

13 Q. But you don't know what changes in the law --
14 or you can't point to the changes in law that incites
15 that fear; is that correct?

16 A. Well, those that you have heard, right?

17 Q. Could you describe one of those fears?

18 A. Well, right now, I don't remember one. But my
19 fear right now is about the changes in the law, and
20 that's the one I fear.

21 Q. The fear is strong enough to make you stop
22 helping people vote, and that's something you've been
23 doing for over 25 years; is that correct?

24 A. Well, yes.

25 Q. And what efforts did you take to familiarize

1 yourself with those -- with the law and the
2 restrictions -- alleged restrictions?

3 A. I don't understand the question.

4 Q. What did you do to familiarize yourself with
5 the law and the alleged restrictions that prohibited
6 you and incited fear in you to help people vote?

7 A. I feel that part of it is me, but the fear is
8 about the laws that they changed and the fear of me not
9 being able to understand them because I don't know
10 enough English.

11 Q. Did you talk to anybody at LUPE about the
12 changes and overcoming your fear?

13 MS. SERNA URIBE: Objection, vague.

14 A. Maybe so.

15 Q. And what did they say?

16 A. That's the problem, that I don't remember many
17 of the things that we talked about. And that's why I
18 don't want to go and help the people, because of the
19 same reason.

20 Q. Did -- you said you did not vote by mail in the
21 last election; is that correct?

22 MS. SERNA URIBE: Objection,
23 mischaracterizes testimony.

24 A. I did not vote because I can still go and
25 exercise the right to vote there at the polling place.

1 MR. SUAREZ: I'm sorry. I want to
2 clarify. Did she say that she could not vote or that
3 she didn't have -- she didn't vote by mail because
4 she -- she could still go to the polling place?

5 A. Yes.

6 Q. So you went to -- you went to a polling
7 location in person to vote in the last election; is
8 that correct?

9 A. Yes.

10 Q. Did you have issues voting?

11 MS. SERNA URIBE: Objection, vague.

12 A. Not in the past election.

13 Q. Did you see any voting assistants there?

14 MS. SERNA URIBE: Objection, vague.

15 A. What do you mean?

16 Q. Did you see any voting assistants there?

17 MS. SERNA URIBE: Objection, calls for
18 speculation.

19 A. I don't remember.

20 THE COURT REPORTER: Can we go off the
21 record just a minute?

22 (Brief recess)

23 Q. I believe you said you don't remember if there
24 was any -- if you saw any voting assistants when you
25 went to the polling location; is that correct?

1 MS. SERNA URIBE: Objection, calls for
2 speculation.

3 A. I didn't see because I tried to go very early.

4 Q. Voting assistants do not assist in the mornings?

5 MS. SERNA URIBE: Objection, vague;
6 objection, calls for speculation.

7 A. They are the people that help you taking you to
8 where you're going to place your ballot.

9 Q. Sure. I'm talking about when you were there
10 placing your ballot, you don't recall seeing any
11 assistants there?

12 MS. SERNA URIBE: Objection, calls for
13 speculation.

14 A. The person that helped me was the person that
15 opened the computer, and he told me that it was ready
16 for me to vote. What I'm trying to say is that there
17 were no other people helping.

18 MS. SERNA URIBE: Can you clarify the
19 translation? There were other people helping that she
20 didn't see is my understanding of what she said.

21 MR. SUAREZ: Can we have her repeat what
22 she said?

23 A. When I went to vote, someone went there and
24 opened the computer because it's their job. And then
25 she left and she let me vote whichever way I needed --

1 I wanted to vote.

2 Q. But do you recall seeing other assisters there?

3 A. Well, the ones that are there by the table
4 where we get to register.

5 Q. You worked as a voting assistant before,
6 correct?

7 A. Yes.

8 Q. Did you see anybody doing what -- the roll that
9 you used to do prior to SB 1?

10 MS. SERNA URIBE: Objection, calls for
11 speculation.

12 A. I don't remember.

13 Q. So you say you didn't help -- you didn't
14 volunteer either with mail-in voting, with voting at
15 the polls during the last election, correct?

16 A. No. I didn't take people to vote. I didn't
17 help people to register to vote by mail, nor help them
18 to vote by mail. Just one person.

19 Q. You only helped one person?

20 A. For her to be registered for her to get her
21 ballot by mail.

22 Q. Did you have any problems doing that?

23 MS. SERNA URIBE: Objection, vague.

24 A. No, because that's one of the people that I go
25 and help at home with the cleaning at home.

1 Q. Let me clarify, because previously you told me
2 that you didn't help anybody because of the fear that
3 you had from SB 1. And now you're saying you did help
4 one person?

5 A. But to vote, I didn't take anybody.

6 Q. Yeah, but you helped her to register to vote,
7 correct?

8 A. I took her application for her to fill it out,
9 and I took it back.

10 Q. To your knowledge, was she able to vote?

11 MS. SERNA URIBE: Objection, calls for
12 speculation.

13 A. I don't know.

14 Q. Did she ever tell you that she was unable to
15 vote?

16 MS. SERNA URIBE: Objection, vague.

17 A. No.

18 Q. So other than that one person, you didn't help
19 as a vote -- you didn't work as a voting assister and
20 you didn't help anybody else mail-in voting. Is that
21 fair?

22 A. Correct.

23 Q. So what is your knowledge, if any, on the
24 effects SB 1 has on voters who need assistance with
25 voting?

1 MS. SERNA URIBE: Objection, calls for
2 speculation; and objection, the question is vague.

3 A. Maybe my problem is that I don't understand the
4 law that well.

5 Q. I understand that. What's your understanding
6 of the effects of the law on people that need help
7 voting?

8 MS. SERNA URIBE: Same objections, calls
9 for speculation and it's vague.

10 A. I don't know.

11 Q. So you don't have any knowledge of the effects
12 of SB 1 on voters who need assistance with voting?

13 MS. SERNA URIBE: Objection,
14 mischaracterizes the testimony.

15 A. Maybe the problem is not theirs. The problem
16 is mine, that I don't understand the law, that I'm not
17 able to understand the law that well.

18 MS. SERNA URIBE: Can I read back the
19 translation? Can it be read back. I believe the
20 witness also testified that she feared the law as well.

21 THE COURT REPORTER: I won't have the
22 Spanish. Do you want the English?

23 MR. SUAREZ: She just wants the
24 translation, correct?

25 MS. SERNA URIBE: I think the translation

1 isn't correct, I think -- or complete, I should say.

2 She testified that she also feared the law. I just

3 want to make sure that that's in the record, the

4 complete reason that she said she feared the law.

5 THE INTERPRETER: Well, I don't have

6 the -- can you read my --

7 THE COURT REPORTER: Not in Spanish, I

8 can't.

9 THE INTERPRETER: No. The interpretation.

10 (Requested portion was read back.)

11 THE INTERPRETER: The interpreter stands

12 corrected. The witness used the word "fear of not

13 understanding the law."

14 Q. So, Ms. Gomez, I understand your fear and your

15 worry. But my specific question is whether you

16 understand or have knowledge or facts regarding how

17 SB 1 has impacted voters who need assistance voting.

18 MS. SERNA URIBE: Objection, compound

19 question, and it's vague, and it calls for speculation.

20 A. I think that the trust of the community is what

21 has been lost because of the fear of going and not

22 finding anybody to help them with voting.

23 Q. What's your basis for that knowledge?

24 A. The fear exists there. They used to look

25 out -- look for us before, because we were one

1 community with them. And now, well, they look for me
2 at least, but I don't feel able to help them.

3 Q. But you testified as to their fear and the
4 effects SB 1 has on them. I'm specifically talking
5 about what's your knowledge as to those effects.

6 MS. SERNA URIBE: Objection, vague;
7 objection, calls for speculation; objection,
8 mischaracterizes prior testimony.

9 A. The community effect or the law?

10 Q. I'm talking about the effects on voters who
11 need assistance voting by mail.

12 MS. SERNA URIBE: Same objections.

13 A. I don't know.

14 Q. So your knowledge of the effects on SB 1 and
15 the voters is speculation, kind of your own thoughts,
16 derived from nothing else?

17 MS. SERNA URIBE: Objection,
18 mischaracterizes prior testimony.

19 A. It's that people are different, so I don't
20 know.

21 Q. Can you give me an example of one person that
22 the effects of -- strike that.

23 Can you give me an example of what one
24 person has said about how SB 1 affects them?

25 MS. SERNA URIBE: Objection, vague; and

1 objection, calls for speculation.

2 A. No. Well, I haven't asked.

3 Q. You haven't talked to anybody regarding the
4 effects of SB 1 on voters?

5 MS. SERNA URIBE: Objection --

6 A. I don't remember.

7 Q. Have you ever requested any accommodations with
8 voting?

9 A. What's the question?

10 Q. Have you ever requested any accommodations to
11 vote?

12 A. I don't understand the question.

13 Q. Have you ever had issues voting?

14 MS. SERNA URIBE: Objection, vague.

15 A. Yes, yesterday.

16 Q. What was your problem yesterday?

17 A. The person that went to the computer to place
18 the ballot, she moved the computer very fast, and I
19 wanted to read. So they struggled for them to start it
20 all over again.

21 Q. You said -- was this -- were you registering to
22 vote yesterday or were you voting yesterday?

23 A. I was voting.

24 Q. Did you ask them to slow down?

25 A. What do you mean?

1 Q. Did you ask them to slow down?

2 A. Yes. I told them that I wanted to read all of
3 the -- all of them that had been changed. I told them
4 that I wanted to read it.

5 Q. And did they let you?

6 A. It took, like, half an hour.

7 Q. But you were able to review what you put down?

8 A. Of course. I waited. That's why I like to do
9 it in person because there I can see it and I can
10 change whatever I want.

11 Q. Do you know of anybody that you used to help
12 vote that had a disability that required assistance
13 voting?

14 MS. SERNA URIBE: Objection, vague and
15 calls for speculation.

16 A. I don't remember.

17 Q. Do you have a disability that requires
18 assistance to vote?

19 A. No. Because now it's in English and Spanish.

20 Q. And you say you don't recall knowing anybody
21 that had a disability in regards to voting that
22 required assistance?

23 A. Disability that they're not able to go, to be
24 present?

25 Q. Yeah, that. Any other disabilities?

1 A. Well, yes, I remember a few people.

2 Q. Were they ultimately able to vote?

3 MS. SERNA URIBE: Objection, calls for
4 speculation.

5 A. The ones that I know, yes.

6 Q. Are there anybody with disabilities that you
7 know of that were unable to vote?

8 MS. SERNA URIBE: Objection, calls for
9 speculation.

10 A. I don't remember.

11 Q. To -- strike that.

12 From what you remember and to your
13 knowledge, people that you knew of that had
14 disabilities were able to vote?

15 MS. SERNA URIBE: Objection, calls for
16 speculation.

17 A. A few that I know.

18 Q. And you don't know anybody with disabilities
19 that couldn't vote, correct?

20 MS. SERNA URIBE: Objection, calls for
21 speculation.

22 A. I don't remember who.

23 Q. So we talked about your fear with mail-in
24 voting, and we talked about your fear of being a voting
25 assistant. Is there any other fears from SB 1?

1 MS. SERNA URIBE: Objection, vague.

2 A. No. Only what I don't understand, the rule.

3 Q. And to be clear, aside from that one person
4 that you helped register to vote, you did not -- you
5 have not helped anybody in mail-in voting process, in
6 registering to vote, and assisting at the polls after
7 2021?

8 MS. SERNA URIBE: Objection, vague.

9 A. I haven't helped them personally. But I just
10 letting them know that it's time to vote, letting them
11 know about the voting places, information that I will
12 give them.

13 Q. So you were still able to volunteer after 2021
14 in relation to voting?

15 A. Only to take them and to give them information.

16 MR. SUAREZ: Pass the witness.

17 MS. SERNA URIBE: Okay.

18 EXAMINATION

19 BY MS. SERNA URIBE:

20 Q. Hi, Senora Gomez. I want to go back. You are
21 aware that you need to register in order to vote,
22 correct?

23 A. Yes.

24 Q. And you're aware that you have to now request
25 an application to vote by mail; is that correct?

1 A. Now I do.

2 MS. SERNA URIBE: I have no further
3 questions. Pass the witness.

4 EXAMINATION

5 BY MR. SUAREZ:

6 Q. When we spoke earlier, you told me that you
7 were unaware that you had to register to vote by mail.
8 Do you recall that?

9 A. Yes, because before, the ballots will arrive by
10 mail, and you wouldn't have to register at certain age
11 of people, because they were already registered to vote
12 in the voting places, polls.

13 Q. So people that were registered to vote were
14 able to vote, correct?

15 A. Yes, they would vote in the polling places.

16 Q. And when you spoke about those people earlier
17 regarding mail-in voting that were unable to vote
18 because they didn't register, is that because they were
19 not registered?

20 A. They didn't register for them to receive the
21 ballot that comes by mail. These are disabled people
22 that cannot drive or they cannot go out.

23 Q. You told me just a few minutes ago that you
24 didn't -- you couldn't recall of anybody that was
25 disabled, and now you're saying that these are disabled

1 people that you do recall?

2 MS. SERNA URIBE: Objection,

3 mischaracterizes the prior testimony.

4 A. These are people that I visited, but I didn't
5 go back to see if they had voted or not.

6 Q. But you are saying that you know that they
7 didn't vote because they didn't register in time?

8 MS. SERNA URIBE: Objection,

9 mischaracterizes the prior testimony.

10 A. They didn't send the registration because the
11 ballot never arrived. They were waiting for it to
12 arrive, but it never did.

13 Q. So it's not an issue with registration. It's
14 an issue with that they didn't request the ballot?

15 A. Well, they didn't ask for it, then they
16 couldn't vote.

17 Q. When you say you gave general information
18 regarding voting, did you inform them that they had to
19 request a ballot?

20 A. Yes.

21 Q. And they still didn't do it?

22 MS. SERNA URIBE: Objection, calls for
23 speculation.

24 A. The problem here is that these are disabled
25 people that cannot drive, and they don't know how to

1 register.

2 Q. But you were still giving them information and
3 assisting them. That's what you just testified to,
4 correct?

5 A. Yes, by taking to register.

6 Q. So would you agree with me that it wasn't
7 restriction from SB 1 but it was -- strike that.

8 Would you agree with me that their failure
9 to request a ballot or register wasn't a restriction --
10 wasn't caused by SB 1?

11 MS. SERNA URIBE: Objection, calls for
12 speculation; objection, lack of personal knowledge.

13 A. Well, if they didn't register, the ballot
14 didn't arrive through the mail, so they didn't vote.

15 Q. But SB 1 didn't prevent you from assisting them
16 or giving them information regarding the need to
17 request a ballot or the need to register to vote.

18 MS. SERNA URIBE: Objection, vague;
19 objection, compound question.

20 A. Well, I gave the information.

21 Q. Let me break it down. Did SB 1 prevent you
22 from giving voters who wanted to vote by mail
23 information regarding the need to request a ballot?

24 MS. SERNA URIBE: Objection, calls for
25 speculation.

1 A. I think it's different when I -- I have to
2 under oath to go and explain the regulations that I
3 want to explain than to when I'm just going to -- to
4 talk to them.

5 Q. So when you're going to assist people to vote
6 by mail, you're still able to do that, correct?

7 MS. SERNA URIBE: Objection,
8 mischaracterizes prior testimony; objection, vague.

9 A. I need to learn how to do it.

10 Q. But you were giving information even when you
11 say you didn't understand the law, correct?

12 MS. SERNA URIBE: Objection,
13 mischaracterizes prior testimony; and objection, vague.

14 A. It's that I don't think it's different when I
15 take them to voting poll to vote and when I give them
16 information. When I give them information, I tell
17 them -- I don't tell them the law says this or the law
18 says that. I just tell them that they need their
19 application for them to complete their ballot to vote.

20 Q. You spoke of the disabilities of these people
21 that were unable to vote by mail. Do you recall that?

22 MS. SERNA URIBE: Objection,
23 mischaracterizes the testimony.

24 A. Yes.

25 Q. Do you recall whether -- strike that.

UNITED STATES OF AMERICA)(
Plaintiff)

VS.)(CASE NO.

THE STATE OF TEXAS, et al.)(5a;21-cv-1085-XR
Defendants)

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